

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

Pierce Duchene, *on behalf of himself and all  
others similarly situated,*

Plaintiff,

v.

Westlake Services, LLC d/b/a Westlake  
Financial Services,

Defendant.

Civil Action No.: 2:13-cv-01577-MRH

Hon. Mark R. Hornak

**MOTION FOR (1) AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND  
(2) AN INCENTIVE AWARD TO THE NAMED PLAINTIFF**

Pursuant to Fed. R. Civ. P. 23(h), the Parties' Settlement Agreement and in accordance with Paragraph 10 of the Court's Preliminary Approval Order (Doc. No. 108), Plaintiff Pierce Duchene and Class Counsel respectfully move this Court for an Order awarding attorneys' fees and expenses of \$3,333,333.33 (one-third of the \$10 million Settlement Fund) and for an incentive award to the Class Representative in the amount of \$10,000.00.

In support, Plaintiff and Class Counsel submit the accompanying memorandum of law in support and the Declarations of Class Counsel Sergei Lemberg and Stephen F. Taylor.

For the reasons set forth in the accompanying memorandum, Plaintiff and Class Counsel respectfully request that the Court grant this motion and award the requested fees, expenses and incentive award.

Dated: June 7, 2016

Respectfully submitted,

By: /s/ Stephen Taylor

Stephen F. Taylor

Sergei Lemberg

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**CERTIFICATE OF SERVICE**

This certifies that on June 7, 2016, a true and correct copy of the foregoing was filed with the Clerk of Court for the United States District Court for the Western District of Pennsylvania using the CM/ECF system, which sent notice of such filing to the following parties:

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By /s/ Stephen Taylor  
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